

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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IN RE: DEALER MANAGEMENT SYSTEMS  
ANTITRUST LITIGATION

This Document Relates to All Cases

MDL No. 2817  
Case No. 18 C 864

Hon. Robert M. Dow, Jr.  
Magistrate Judge Jeffrey T. Gilbert

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**PLAINTIFFS' MOTION TO COMPEL  
DEFENDANT THE REYNOLDS AND REYNOLDS COMPANY  
TO PRODUCE UNREDACTED DOCUMENTS FOR *IN CAMERA* REVIEW**

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Plaintiffs<sup>1</sup> respectfully move this Court to compel The Reynolds and Reynolds Company (“Reynolds”) to produce unredacted documents for *in camera* review. In support of this motion, Plaintiffs incorporate by reference the memorandum of law and exhibits filed concurrently herewith and any oral argument that the Court may allow at a hearing on this Motion.

Pursuant to Local Rule 37.2, Plaintiffs certify that they have met and conferred with counsel for Defendant Reynolds in a good faith attempt to resolve the disputes presented by this Motion.

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<sup>1</sup> For purposes of this motion, “Plaintiffs” excludes the Dealership Class Plaintiffs given their pending settlement with Reynolds.

Dated: September 28, 2018

Respectfully submitted,

/s/ Derek T. Ho

Derek T. Ho

**KELLOGG, HANSEN, TODD,**

**FIGEL & FREDERICK, P.L.L.C.**

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**CERTIFICATE OF SERVICE**

I, Derek T. Ho, an attorney, hereby certify that on September 28, 2018, I caused a true and correct copy of the foregoing **PLAINTIFFS' MOTION TO COMPEL DEFENDANT THE REYNOLDS AND REYNOLDS COMPANY TO PRODUCE UNREDACTED DOCUMENTS FOR IN CAMERA REVIEW** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by email to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF system.

*/s/ Derek T. Ho*

Derek T. Ho  
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